

December 19, 2012

Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 Twelfth Street, SW  
Washington, DC 20554

Re: *Notice of ex parte presentations – WC Docket No. 11-141 (Application for Review of GCB Order)*

Dear Ms. Dortch:

On December 17-18, 2012, the American PrePaid Phonecall Association (“APPPA”) had three meetings with Commission staff to discuss the pending application for review of the Wireline Competition Bureau’s (“Bureau’s”) order in the above-referenced docket.<sup>1</sup> In the meetings, APPPA was represented by its Chairman, Pete Pattullo, CEO of Network Enhanced Telecom, LLP (“NetworkIP”), and Board Members Ray Valmé, CEO of Dial World Communications, and Thomas Kimura, associate general counsel of NobelTel, LLC. The undersigned counsel to NetworkIP also attended the meetings. The meetings were with (1) Michael Steffen of the Office of Chairman Julius Genachowski, and the following staff from the Bureau: Lisa Gelb, William Dever, Denise Coca, and Travis Litman; (2) Angela Kronenberg of the Office of Commissioner Mignon Clyburn; and (3) Nicholas Degani of the Office of Commissioner Ajit Pai.

In the meetings, APPPA argued that the Commission should grant the pending application for review of the *GCB Order*. APPPA’s arguments were in line with its prior comments in this proceeding, arguing that the *GCB Order* is inconsistent with the Commission’s duty to promote payphone deployment to benefit the public, and legally flawed.<sup>2</sup> The attached slides flesh out some additional points that were made in the meetings.

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<sup>1</sup> *Petition of GCB Communications, Inc. d/b/a Pacific Communications and Lake Country Communications, Inc. for Declaratory Ruling*, WC Docket No. 11-141, Declaratory Ruling, 27 FCC Rcd 7361 (WCB 2012) (“*GCB Order*”).

<sup>2</sup> See Comments of APPPPA, WC Docket No. 11-141 (filed Sept. 24, 2012).

WILKINSON ) BARKER ) KNAUER ) LLP

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This letter is submitted consistent with the Commission's ex parte rules.

Sincerely,

WILKINSON BARKER KNAUER, LLP

/s/

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L. Charles Keller

Attachment

cc (email): Michael Steffen  
Angela Kronenberg  
Nicholas Degani  
Lisa Gelb  
William Dever  
Denise Coca  
Travis Litman

# APPPA

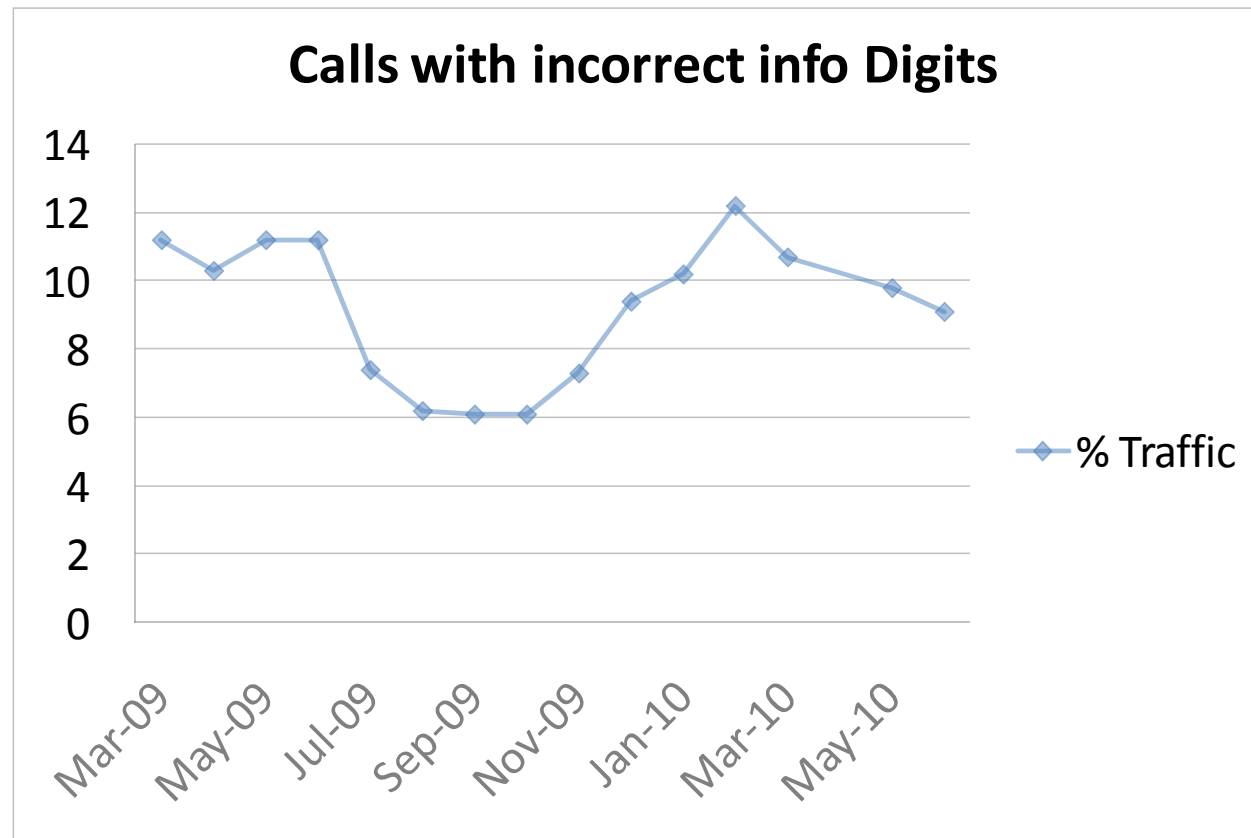
American PrePaid Phonecall Association

## American PrePaid PhoneCall Association (APPPA)

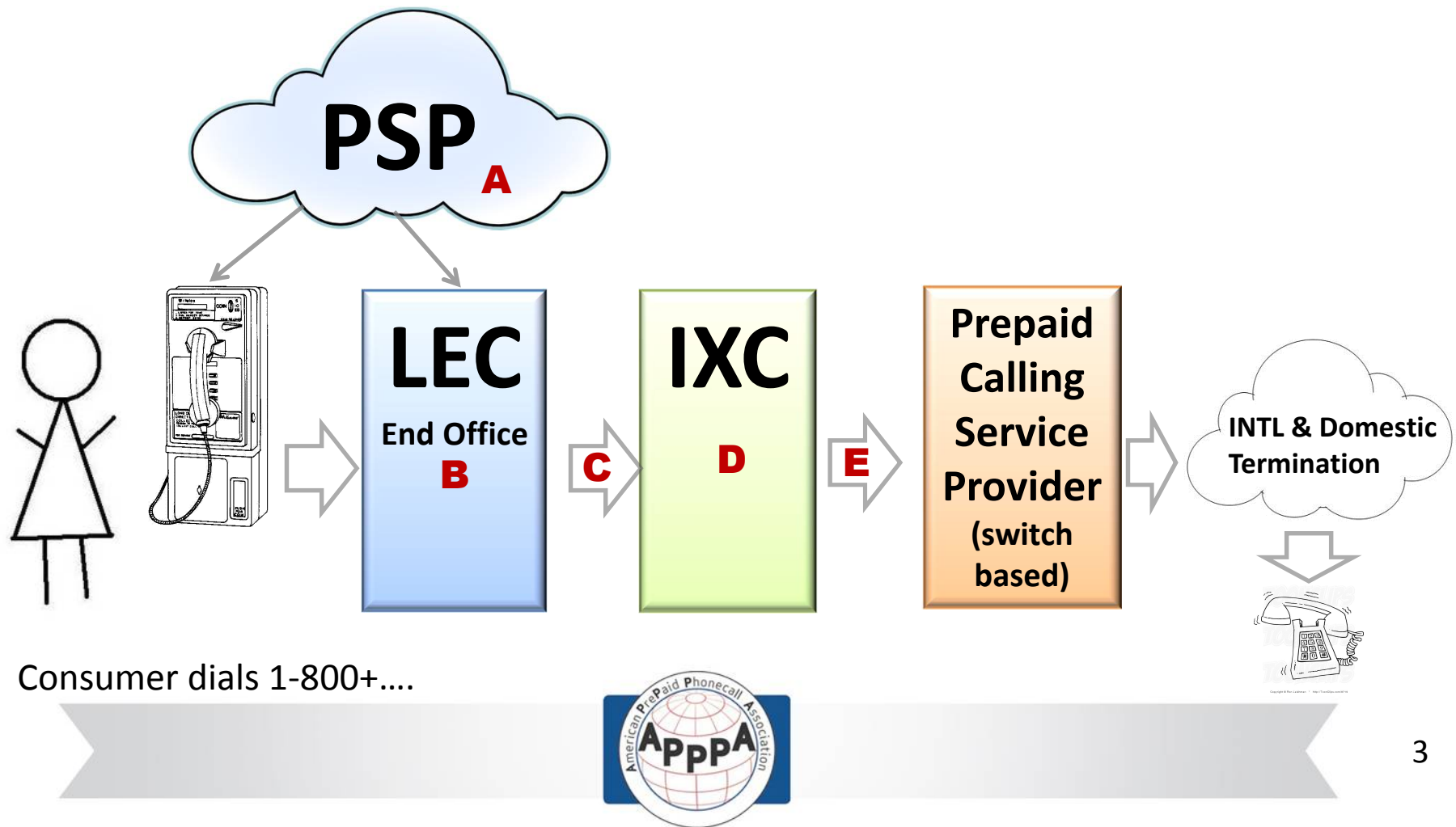
Application for Review of WCB's GCB Order  
(DA 12-1046) WC Docket No. 11-141



## A member & APCC spent over a year trying to fix Flex/ANI



## Typical Payphone Network Topology



## Flex/ANI Problem Points Identified

- (**A**) Local payphone line ordered incorrectly
- (**B**) Local LEC needs to have line setup as payphone
- (**B**) Local LEC needs to have switch software enabled for Flex ANI
- (**C**) Local LEC trunk group setup for Flex ANI
- (**D**) IXC needed to order and configure Flex ANI
- (**E**) Service providers having problems if the interconnections with IXC's are SIP or ISDN.

**The biggest issue uncovered was the LEC's defaulting to NO Flex/ANI when changes were made to facilities between LEC and IXC**

